

Author Full Name : Cherie Turner**Received Date :** 06/24/2024 05:35 PM**Comments Received :**

I am submitting this comment in opposition to the US Department of Education's proposal to eliminate the Academic Libraries (AL) survey component from the Integrated Postsecondary Education Data System (IPEDS) survey. I am the primary person at my R1 research university compiling data to submit to the AL survey. I also regularly use data from the AL survey component, often in combination with data from other IPEDS component surveys, for the purposes of benchmarking to peer institutions, advocating for funding or staffing with university leadership, and supporting regional and disciplinary accreditation. In particular we have benefited from the ability to look for peer groups that are relevant for us, which has included focusing on other urban research universities and on other HSIs both of which often face similar challenges to the ones we see.

There are some alternate sources for data relevant to the use cases I listed above, but there are significant downsides to all of them. Most surveys that collect this type of data are only available to a subset of institutions like the Association of Research Libraries (ARL) Statistics Survey, which is only available to ARL institutions. My institution is a member of ARL, but many institutions that we consider our peers are not. The most broadly accessible survey, the Association of College and Research Libraries (ACRL) Academic Library Trends and Statistics Survey, does not make the full data available for free as is the case for the AL survey. It also does not have an adequate mechanism to incentivize participation, which shows in the response rate. I've recently been told that less than 50% of colleges and universities complete the survey.

Assuming we are able to continue to access data like that collected in the AL survey from peer institutions if the AL survey is discontinued, we will then have to contend with inconsistent definitions for the metrics based on what survey or other purpose the data was prepared for. Many of the metrics that we report to the AL survey are needed for day to day operation or are requested by university administration, so we are spending very little additional time to prepare for the AL survey. For us the time we spend is absolutely worthwhile given that it allows us consistent points of comparison for so many similar institutions.